

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA

V.

**CRIMINAL COMPLAINT
(Redacted)**

STANLEY WREN VICKERS

CASE NO: 10-MJ- 024

I, STEPHEN K. LIES, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

Between in or about March, 2003 and in or about May, 2003, in the Western District of Tennessee, and elsewhere, the defendant,

-----**STANLEY WREN VICKERS**-----

knowingly transported an individual who had not attained the age of 18 years, in interstate commerce with intent that the individual engage in unlawful sexual activity, that is, violation of Kentucky criminal statutes, cited as Ky. Rev. Stat. Ann. Section 510.090, (Sodomy in the Third Degree) and Ky. Rev. Stat. Ann. Section 510.110 (Sexual Abuse In the First Degree) and Missouri criminal statute, cited as Mo. Rev. Stat. Section 566.068 (Child Molestation in the Second Degree) ; All in violation of Title 18, United States Code, Section 2423(a) and Section 2.

I further state that I am a Special Agent with the FBI Crimes Against Children Task Force and that this complaint is based on the following facts:

(SEE AFFIDAVIT OF SPECIAL AGENT STEPHEN K. LIES WHICH IS ATTACHED HERETO AND FULLY INCORPORATED HEREIN BY REFERENCE)

Continued on the attached sheet and made a part hereof X Yes ___ No

Signature of Complainant

Sworn to before me, and subscribed in my presence

Date: _____ at Memphis, Tennessee

Name & title of Judicial Officer

Signature of Judicial Officer

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V.

AFFIDAVIT

STANLEY WREN VICKERS

I, STEPHEN K. LIES, being duly sworn state as follows:

1. I am a Special Agent and have been actively involved in that capacity since August, 1999. I am currently a member of the Memphis FBI Crimes Against Children Task Force (MCACTF), and routinely conduct investigations which pertain to federal crimes involving the sexual exploitation of minors (persons under the age of 18 years). I have been in my current assignment for approximately 10 years.

2. I am conducting an investigation into certain activities of Stanley Wren Vickers, (hereinafter "Vickers") age 44, and his knowing transporting of an individual who had not attained the age of 18 years, in interstate commerce, with intent that the individual engage in unlawful sexual activity; in violation of Title 18 Section 2423(a). The following information was obtained through observations and conversations of your Affiant personally, through the assistance of other law enforcement agents and agencies, including their reports, and through other sources specifically named in this Affidavit. Since this Affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to arrest STANLEY WREN VICKERS, for violation of Title 18 USC Section 2423(a).

3. On March 9, 2010, your Affiant met with Martin, Tennessee, Police Detective James R. Hatler who was conducting an investigation into the relationship between Vickers, a teacher in the Martin, Tennessee, school system, and an individual, **(redacted)**, during the time period of 2003. **(redacted)** was 14 years of age and in the 8th grade at that time. On February 25, 2010, Detective Hatler interviewed **(redacted)** who provided the following information. From 2002 through 2005, **(redacted)** had a relationship with Stan Vickers who was his soccer coach and employer. Vickers was the Martin Middle school soccer coach and **(redacted)** was one of his players on the team. Vickers also had a business as a Disc Jockey (DJ) and paid **(redacted)** to assist him at events both in Tennessee and other states. **(redacted)** had been a student at the Middle school where Vickers taught. When **(redacted)** graduated to High School Vickers also transferred to the same school where he became a teacher. During this relationship Vickers introduced **(redacted)** to discussions about the sexual hazing that went on in his

college fraternity. Vickers used “dares and bets” to entice **(redacted)** to urinate on him, paddle him, and engage in oral sex and masturbation. These incidents occurred in various places in Tennessee to include a shoe store in Sharon, Tennessee, a church parking lot, the concession stand at the football field, as well as in hotels in St. Louis, Missouri, and Paducah, Kentucky.

4. During the spring of 2003, while **(redacted)** was in the 8th grade, Vickers paid him to work at a DJ event in Paducah, Kentucky, that was held on a boat. After the event, Vickers checked into a hotel with **(redacted)**. The Kentucky hotel room had a single king size bed and a jacuzzi. Vickers then engaged in fondling **(redacted)** which progressed into having oral sex with him. Vickers used the plastic covering from a cup to put over **(redacted)** penis while Vickers performed oral sex on him.

6. During May, 2003, **(redacted)** traveled with Vickers to St. Louis, Missouri, on a school trip with other 8th grade students in the **(redacted)**. Vickers was **(redacted)** chaperone and the two of them roomed together and shared a bed. During the trip Vickers and **(redacted)** engaged in oral sex in the Missouri hotel room.

7. A Kentucky criminal statute, cited as Ky. Rev. Stat. Ann. Section 510.090, (Sodomy in the Third Degree) provides that “A person is guilty of Sodomy in the Third Degree when: (b) Being twenty-one (21) years old or more, he engages in deviate sexual intercourse with another person less than sixteen (16) years old.” According to Kentucky law, “Deviate sexual intercourse” means “any act of sexual gratification involving the sex organs of one person and the mouth or anus of another; or penetration of the anus of one person by a foreign object manipulated by another person.” Said Kentucky criminal statute was in effect in 2003.

8. Another Kentucky criminal statute, cited as Ky. Rev. Stat. Ann. Section 510.110 (Sexual Abuse In the First Degree), provides that “a person is guilty of sexual abuse in the first degree when: (c) Being twenty-one (21) years old or more, he or she: 1. Subjects another person who is less than sixteen (16) years old to sexual contact;” According to Kentucky law, “Sexual Contact” means any touching of the sexual or other intimate parts of a person done for the purpose of gratifying the sexual desire of either party.” Said Kentucky criminal statute was in effect in 2003.

9. A Missouri criminal statute, cited as Mo. Rev. Stat. Section 566.068 (Child Molestation in the Second Degree) provides that “A person commits the crime of child molestation in the second degree if he or she subjects another person who is less than seventeen years of age to sexual contact.” According to Missouri law, “Sexual Contact” means “any touching of another person with the genitals or any touching of the genitals or anus of another person, or the breast of a female person, or such touching through the clothing, for the purpose of arousing or gratifying sexual desire of any person.” Said Missouri criminal statute was in effect in 2003.

10. On March 3, 2010, **(redacted)** made two consensually monitored telephone calls to Vickers. During these conversations, Vickers acknowledged that they engaged in oral sex in St. Louis while on the **(redacted)** trip. Vickers also acknowledged an incident that occurred at the store in Sharon, Tennessee, when **(redacted)** was either a freshman or a sophomore in High School. The event was memorable because they were almost caught in the middle of a sexual act.

Your Affiant believes the above constitutes probable cause that STANLEY WREN VICKERS has violated a federal criminal statute, specifically, Title 18, United States Code, Section 2423(a).

Based upon the above, your Affiant is requesting issuance of a warrant for the arrest of STANLEY WREN VICKERS.

SA STEPHEN K. LIES
Affiant

SWORN TO AND SUBSCRIBED BEFORE ME THIS ____ DAY OF March, 2010.

UNITED STATES MAGISTRATE JUDGE